

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Bradford J. Sandler, Esq.

Paul J. Labov, Esq.

Beth E. Levine, Esq.

**PACHULSKI STANG ZIEHL & JONES LLP**

780 Third Avenue, 34<sup>th</sup> Floor

New York, NY 10017

Telephone: (212) 561-7700

Facsimile: (212) 561-7777

bsandler@pszjlaw.com

plabov@pszjlaw.com

blevine@pszjlaw.com

James S. Carr, Esq.

Dana P. Kane, Esq.

Sean T. Wilson, Esq.

**KELLEY DRYE & WARREN LLP**

One Jefferson Road, Second Floor

Parsippany, NJ 07054

Telephone: (973) 503-5900

Facsimile: (973) 503-5950

jcarr@kelleydrye.com

dkane@kelleydrye.com

swilson@kelleydrye.com

*Counsel to the Liquidation Trustee*

In re:

RTW RETAILWINDS, INC.,<sup>1</sup>

Debtor.

Case No.: 20-18445 (JKS)

Chapter 11

**Judge: Hon. John K. Sherwood**

<sup>1</sup> The remaining Debtor in this chapter 11 case and the last four digits of the Debtor's federal tax identification number is RTW Retailwinds, Inc. (1445). By order and final decree entered February 22, 2021, the chapter 11 cases of the Debtor's affiliates were closed [Docket No. 844].

META Advisors LLC, in its capacity as Liquidation  
Trustee of the RTW Liquidation Trust,

Plaintiff,

v.

SOURCING UNLIMITED LLC,

Defendant.

Adv. Proc. No. 22-01173 (JKS)

**STIPULATION EXTENDING TIME TO ANSWER, MOVE OR  
OTHERWISE RESPOND TO COMPLAINT**

Plaintiff, META Advisors LLC, in its capacity as Liquidation Trustee of the RTW Liquidation Trust ("Plaintiff") and defendant, Sourcing Unlimited LLC ("Defendant"), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on June 24, 2022, Plaintiff filed a complaint (the "Complaint") against Defendant;

WHEREAS, the summons (the "Summons") was issued on June 27, 2022; and

WHEREAS, on June 27, 2022, Defendant was served with the Summons and Complaint;

The parties hereby stipulate and agree to the matters set forth below:

1. The time by which Defendant is required to answer, move or otherwise respond to the Complaint is extended through and including August 15, 2022.

2. Defendant does not challenge personal jurisdiction and waives any objection to service of process of the summons and complaint in this adversary proceeding.

*[signature block on following page]*

Dated: July 11, 2022

KELLEY DRYE & WARREN LLP

/s/ James S. Carr

James S. Carr, Esq.  
Dana P. Kane, Esq.  
Sean T. Wilson, Esq.  
One Jefferson Road, Second Floor  
Parsippany, NJ 07054  
Telephone: (973) 503-5900  
Facsimile: (973) 503-5950  
jcarr@kelleydrye.com  
dkane@kelleydrye.com  
swilson@kelleydrye.com

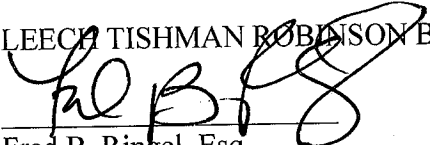
and

Bradford J. Sandler, Esq.  
Paul J. Labov, Esq.  
Beth E. Levine, Esq.  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34th Floor  
New York, NY 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
bsandler@pszjlaw.com  
plabov@pszjlaw.com  
blevine@pszjlaw.com

*Counsel to the Liquidation Trustee*

Dated: July 15, 2022

LEECH TISHMAN ROBINSON BROG PLLC

  
Fred B. Ringel Esq.  
Steven Eichel, Esq.  
875 3rd Avenue, 9th Floor  
New York, NY 10022  
Telephone: 212.603.6300  
seichel@leechtishman.com

*Counsel to Defendant*